

## **REMARKS**

### **Rejections**

#### ***Rejections under 35 U.S.C. § 103(a)***

##### **Claims 1-22**

Claims 1-22 stand rejected under 35 U.S.C. § 103(a) as being anticipated by U.S. Patent 5,652,880 to Seagraves in view of U.S. Patent 5,852,819 to Beller. Applicant respectfully submits that the combination of Seagraves and Beller is improper and furthermore does not disclose each and every element of the invention as claimed in claims 1-22.

In response to Applicant's previous argument that Seagraves contains no disclosure directed to semantic description of audiovisual information as claimed, the Examiner agreed but is now asserting that Beller discloses semantic descriptions of audiovisual information.

Beller discloses determining data patterns by analyzing data from various types of databases, including relational and non-relation systems. The patters are presented to user through statistical or graphical representations. Beller also states that visual or audible signals, such as colors or sounds, may be presented to the user to convey information about the data. The Examiner appears to be relying on the visual/audible signals in Beller as equivalent Applicant's claimed audiovisual information. The Examiner also appears to be relying on Beller's use of non-relational databases as teaching Applicant's claimed limitation of an entity that describes a non-relational part of a semantic description. In doing so, the Examiner has misinterpreted both Applicant's claims and Beller's disclosure.

As well-known in the art, audiovisual information can be described in textual terms as a series of related objects, events, and attributes of the objects and events. The textual terms thus form a "semantic description" of the audiovisual information. The semantic description is often represented as a data structure containing entries representing the objects, events, and attributes. In addition, the semantic description also contains entries that define the relationships among the objects and events. Applicant specifically amended to claims in the prior response to clarify that Applicant's claimed entity describes a non-relationship part of a semantic description, i.e., an entry

representing an object, event, or attributes, but not an entry that defines a relationship. Beller contains no teaching or suggestion of a semantic description as the term is used within the art.

Furthermore, Applicant claims a concept that is a collection of properties of the audiovisual information. There is no teaching or suggestion in Beller that properties of the visual/audible signals are collected into a concept.

The Examiner has stated the motivation for the combination of Seagraves and Beller is to give Seagraves the ability to describe concepts and non-relational parts of a semantic description of audiovisual information. However, Beller does not teach either concepts nor semantic descriptions as claimed by Applicant. Therefore, the Examiner stated motivation is not supported by the teaching of Beller and the combination is improper.

Moreover, because Beller cannot be properly interpreted as disclosing either Applicant's claimed concept nor non-relational part of a semantic description, the combination of Seagraves and Beller does not teach each and every limitation of Applicant's invention as claimed.

Accordingly, Applicant respectfully requests the withdrawal of the rejection of claims 1-22 under 35 U.S.C. § 103(a) over the combination of Seagraves and Beller.

## SUMMARY

Claims 1-22 are currently pending. In view of the foregoing remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Sue Holloway at (408) 720-3476.

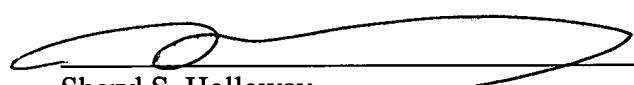
**Deposit Account Authorization**

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

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